



**DEPARTMENT OF THE TREASURY**  
**Internal Revenue Service**  
**Criminal Investigation**

**Memorandum of Interview**

**Investigation #:** [REDACTED] **Location:** Phone call from Chris Werwega  
**Investigation Name:** JAMES D PIERON JR  
**Date:** September 24, 2012  
**Time:** 9:05-10:00 AM  
**Participant(s):** Chris Werwega, Interviewee  
Scott Hollabaugh, Special Agent

On the above date and time, Special Agent Hollabaugh received a telephone call from Chris Werwega in response to a voicemail Agent Hollabaugh left for Werwega. Agent Hollabaugh identified himself as a special agent with IRS Criminal Investigation, and told Werwega he is assisting in an investigation of JAMES PIERON. Agent Hollabaugh asked Werwega if he would be willing to answer questions regarding PIERON and his businesses. Werwega agreed to answer questions and provided the following information:

1. Werwega stated he is JAMES PIERON's stepfather. He married PIERON's mother, Sandra, in 1995. [REDACTED] His home address is 4290 Flexer Drive, Homewood Beach, Florida 34607. His cell phone number is (352) 584-5097. Werwega said he is a retired bank examiner for the State of Michigan, and he currently does part time loan review work for banks. Werwega stated he majored in accounting at Eastern Michigan University. He does not have a CPA license or very much tax preparation experience. Werwega said he does his own taxes and his kid's taxes. Werwega said he prepared PIERON's personal tax returns for the years 2001 through 2006.
2. Werwega stated he has known PIERON since about 1995. Werwega said PIERON asked him about preparing his taxes during a visit to his house around Christmas in 2008. Werwega said PIERON told him he wanted to get current on his taxes and asked if he could help prepare them. Werwega said the returns were all delinquent, but PIERON didn't say why he hadn't filed them on time. Werwega said PIERON told him he just wanted to get them current. Werwega stated PIERON gave him information on his foreign income, and he also got some information from PIERON's secretary, Christine Phillips. Werwega said he had to request some information from the IRS because PIERON didn't have it available. Werwega stated he had no experience preparing returns with foreign income so he had to do a lot of research on how

to report it. Werwega said PIERON was out of the country when he prepared the returns. He communicated with PIERON by telephone and email. Werwega said he might have met with PIERON once during the preparation of the returns. Werwega said PIERON also wanted him to prepare his 2007 and 2008 returns, but there was capital gains activity in those years that he wasn't qualified to handle. Werwega said PIERON had capital gains from the sale of JDFX stock, and he wanted to offset the gains with losses from loans he made to JDFX. Werwega said he didn't know how to handle the capital gains and losses so he advised PIERON to go elsewhere. Werwega said he didn't request any payment for his work on PIERON's returns, but PIERON still paid him several thousand dollars.

3. Werwega stated he might have discussed Foreign Bank Account Reports (FBAR) with PIERON, but he doesn't recall for sure. Werwega said he doesn't recall preparing any FBAR's for PIERON. Werwega said he doesn't know why there was no Schedule B filed with PIERON's returns. Werwega said it could have been an oversight in his part, but he doesn't recall PIERON giving him any information for interest income.
4. Werwega said PIERON started out working for UBS Bank in Switzerland doing software programming for their foreign exchange division. After working for UBS, PIERON started his own foreign exchange company called JDFX and developed his own software. Werwega said PIERON's first attempt at starting JDFX failed, and then he started JDFX a second time with money from investor Trevor Cook. Werwega stated PIERON told him he personally loaned money to JDFX and lost the money. PIERON told Werwega he wished he had handled it differently. Werwega said PIERON mentioned the indictment of Trevor Cook to him, but he didn't blame the loss from his loans on Cook.
5. Werwega said PIERON moved his business operations to the United States in late 2009 or early 2010. Werwega stated PIERON told him he moved his businesses to the United States because of lower operating costs. PIERON told Werwega he realized he didn't have to operate his business in a large financial center like Zurich, Switzerland. PIERON said he closed down JDFX and liquidated it because he could do better in the United States. Werwega said he heard PIERON had an offer from the court trustee in the Trevor Cook case to buy out Cook's ownership position in JDFX. Werwega said PIERON didn't want to do it because he didn't think JDFX was worth that much money. Werwega could not recall if he heard this from PIERON, PIERON's mother, or one of PIERON's employees.
6. Werwega said he doesn't know what PIERON's ownership position was in JDFX Technologies, JDFX Holding, IB Technologies, or Komplique, Inc. Werwega said he thinks PIERON was the president of JDFX Fund Ltd. Werwega thinks PIERON provided investment advisory services through JDFX Fund Ltd. Werwega said PIERON tried to explain all of his businesses to him, but he has no recollection of what PIERON told him.

I prepared this memorandum on September 24, 2012, after refreshing my memory from notes made during and immediately after the interview with Chris Werwega.

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Scott Hollabaugh  
Special Agent